

**U.S. ENVIRONMENTAL PROTECTION AGENCY
FINAL POLLUTION REPORT**

I. HEADING

Date: April 9, 2004
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U.S. EPA Region II
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S. Soden, WRS I&E, Inc. Weston Solutions

Subject: Buffalo Weaving and Belting Co., City of Buffalo, NY -
Fire damaged buildings containing drums of unknown materials and fire
damaged materials, and suspected asbestos-wrapped piping beneath
collapsed roofs and fire damaged debris. Other buildings contain drums,
laboratory chemicals, asbestos, and electrical transformers.

POLREP NO: Twelve (12) and Final - www.epaosc.net/buffaloweaving

II. BACKGROUND

SITE/SPILL NO.: 02TU
RESPONSE AUTHORITY: CERCLA/SARA
NPL STATUS: Non-NPL
CERCLIS ID: NYD002111375
START DATE: April 18, 2003
COMPLETION DATE: April 9, 2004
VERBAL FUNDING: April 18, 2003 by ERRD Division Director
ACTION MEMO (AM) STATUS: Signed May 5, 2003
AM CEILING INCREASE STATUS: Signed September 26, 2003

III. RESPONSE INFORMATION

A. Situation

The Site is the location of a former sheet rubber and textile/rubber belting manufacturing facility. Manufacturing was conducted from 1892 until January 2003. On April 15 and 16, 2003, a three-alarm fire destroyed the central portions of five of the Site buildings where rubber products were produced. Arson was the suspected cause of the fire and two suspects were arrested. As a result of the damage caused by the fire, on April 18, 2003 the Site was verbally referred to the U.S. Environmental Protection Agency (EPA) by the New York State Department of Environmental Conservation (NYSDEC) for a CERCLA removal action. Written

confirmation of this verbal referral was provided by NYSDEC in correspondence dated April 23, 2003. The referral requested that EPA perform an appropriate CERCLA response action, based upon Site conditions after the fire.

Following the verbal request for assistance by NYSDEC, EPA performed a Site visit on April 18, 2003. During the Site visit, the EPA On-Scene Coordinator performed an expedited removal assessment (ERA). The major observations noted during the ERA include the following:

- Fire damaged or destroyed approximately 5 of 24 Site buildings with intact and fire damaged drums contained therein;
- Suspected asbestos-coated piping within the fire-damaged building, including areas where the roof has collapsed onto piping, and fire-fighting water had damaged the asbestos piping; and
- No Site security or fencing in the front or rear of the Site.

In addition to the observations in the field, EPA was provided with a drum and laboratory inventory by the City of Buffalo. This inventory revealed the presence of approximately 100 drums and approximately 500 containers of chemicals in containers sized 5 gallons or less. The inventory revealed the presence of methyl ethyl ketone, toluene, ammonia, trichloroethene, and various containers of unknowns.

B. Actions Taken

1. As a result of the RSE, the OSC and Removal Action Branch (RAB) management immediately contacted the Division Director of the Emergency and Remedial Response Division (ERRD). The Division Director was briefed about the Site conditions and granted Verbal Authorization of Funding on April 18, 2003. The initial Site ceiling was authorized as \$70,000, of which \$50,000 is for mitigation contracting.
2. EPA met with the cleanup contractor at the Site on April 18, 2003, marking the start date for the removal action. The contractor immediately provided 24-hour security at the Site and began to install fencing around the portions of the buildings damaged by the fire.
3. EPA mobilized Weston Solutions (RST) to the Site to provide technical and air monitoring support. During the entire removal action, monitoring for dust particulates and volatile organic compounds indicated no readings above background.
4. The Action Memorandum for the Site was approved by the ERRD Division Director on May 5, 2003. The following work authorized by the Action Memorandum has been undertaken and completed:
 - Dismantling of Fire Damaged Buildings - EPA began dismantling fire-damaged buildings on May 12, 2003 and sent the fire debris for off-site disposal. Recycling of the scrap metal and brick was completed as practicable. The buildings that were undamaged by the fire were not demolished.

- Removal of Drums and Containers from Fire Damaged Buildings - As containers within the fire-damaged buildings were reached during the dismantling operation, the containers were stabilized and removed from the fire debris and building. EPA utilized a centralized and secure area on-Site to stage the drums removed from the fire damaged buildings. Container sampling was performed, as well as, off-Site disposal, as appropriate. Disposal of the drums and other containers was completed in December 2003. The waste disposition table in Section V. of this POLREP summarizes waste sent off-Site. Drums logs and drum photographs were maintained on-Site and identify buildings where drums originated and corresponds to all aspects of waste disposal.

- Removal of Asbestos Piping and Debris - As the building was dismantled, EPA carefully remove fire debris in proximity to asbestos piping. When asbestos piping was exposed, an encapsulant was applied to the asbestos to limit the potential for friable asbestos fibers to be released. Encapsulant binds the asbestos particulates into a mass and limits the potential for release. After the encapsulant was applied, the piping and/or the asbestos was placed into a container suitable for disposal of asbestos containing materials and was shipped for off-Site disposal at an appropriate disposal facility.

- Collection of Drums and Other Containers from All Site Buildings - The Site inventory provided to EPA, and subsequent investigations of undamaged Site buildings, indicated the other Site buildings contained drums and other containers of hazardous substances. EPA moved these containers into the on-Site staging area that was used for containers removed from the fire damaged buildings. Container sampling was performed as well as off-Site disposal, as appropriate. Disposal of the drums and other containers was completed in December 2003. The waste disposition table in Section V. of this POLREP summarizes waste sent off-Site. Drums logs and drum photographs were maintained on-Site and identify buildings where drums originated and corresponds to all aspects of waste disposal.

- Staging and Segregation of Site Chemicals - All containers that were open or of questionable integrity were over-packed or transferred into new containers. Containers were placed in compatible waste groups and placed into a secure area of the Site. Disposal of the drums and other containers was completed in December 2003.

- Removal of Site Tanks in Close Proximity to Fire Damaged Areas - One above ground elevated storage tank containing 1,000 gallons of unknown materials was adjacent to the fire-damaged Site buildings. Two, 10,000 gallon underground storage tank were beneath the fire debris at the Site. EPA accessed these tanks during the removal action, sampled the contents, and removed them. Removal of the tanks and contents was completed in September 2003.

- Assessment of Electrical Transformers On-Site - The Site power was shut off and the Site contained electrical transformers in various stages of condition and age. The oil from these electrical transformers and equipment was sampled. PCB transformers were removed from the Site and disposed. Other electrical transformers that did not contain PCBs were labeled and left on-Site.

Asbestos Abatement and Stabilization- Asbestos contained within the boiler room at the Site was in poor condition and the roof was partially collapsed. EPA abated the asbestos within the boiler room and repaired the room. Asbestos that was within the boiler room and not removed was sprayed with and encapsulant and/or wrapped with protective tape. Asbestos within the main Site buildings was sprayed with encapsulant and removed on a case-by-case basis.

C. Current Actions

1. Results of the geoprobe sampling and the groundwater samples have been received. These results have been forwarded to NYSDEC and NYSDOH for consideration. The subsurface samples and groundwater samples appear to contain minimal contamination.
2. Final grading at the Site was completed on April 9, 2004, marking the completion of the work authorized by the Action Memorandum.

D. Future Actions

A closeout press conference will be held at the Site before the end of April, 2004. Residents have been continuously notified about the status of the Site during the removal action. The OSC recently attended a block club meeting to provide residents with a status report.

E. Key Issues

None

IV. COST INFORMATION: As of 04/09/04

Site Ceiling as of 04/09/04			
	Total Ceiling	Costs to Date	Amount Remaining
WRS I&E	\$ 1,625,000	\$ 1,585,000	\$ 40,000
RST	\$ 206,000	\$ 202,000	\$ 4,000
Totals	\$ 1,831,000	\$ 1,787,000	\$ 44,000

An additional \$100,000 was obligated to the project on January 23, 2004. This money was part of the overall project money authorized from the Action Memorandum and was used for Site restoration and payment on invoices related to waste disposal.

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data, which the OSC must rely upon, may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

V. DISPOSITION OF WASTES:

The following table details the status of the waste shipped from the Site.

Waste Disposal Table

Waste Type/Location	EPA Waste Codes	Quantity						Disposal Facility/Location	City EPA ID Num	Treatment Method
		Drums	of load	Tons	Each	Yards	Gallons			
Asbestos Contaminated Debris	None		15	144.27				Minerva Enterprises, Waynesburg, OH		Landfill
Bagged Asbestos	None		2	6.9				BFI, Niagara Falls, NY	N/A	Landfill
Demolition Debris	None		113	1238.4				BFI, Niagara Falls, NY	N/A	Landfill
PCB Contaminated Soil (Bulk)	None		7	135.76				Wayne Disposal, Bellville, MI	MID048090633	Landfill
PCB Contaminated Soil (Drums)	None	12 X 55						Wayne Disposal, Bellville, MI	MID048090633	Landfill
Cardboard (Non-Hazardous)	None		4	3.19				BFI, Niagara Falls, NY	N/A	Recycle
Scrap Steel	None		45	561.45				Lake Erie Recycling, Buffalo, NY	N/A	Recycle
Waste Tires	None		1	1.11				BFI, Niagara Falls, NY	N/A	Transfer to Huron Recovery
#6 Oil	None		2	13.76				EICS to Modern Landfill, Model City, NY	N/A	Stabilize/Landfill
#6 Oil contaminated Debris	None		3	26.13				Modern Landfill, Model City, NY	N/A	Landfill
Lab Pack - Manifest #NYG2499993										
Waste Flammable Liquids	D001	3 X 55						Environmental Enterprises	OHD083377010	Incinerate
Waste Corrosive Liquids	D002	6 X 55						Environmental Enterprises	OHD083377010	Wastewater Treatment
Waste Chemicals, Non-Regulated	None	12 X 55						Environmental Enterprises	OHD083377010	Subtitle D Landfill
Lab Pack - Manifest #NYG2499885										
Waste Flammable Liquids	D001, D040, F002	1 X 55						Environmental Enterprises	OHD083377010	Fuel Blend
	F005									
Waste Flammable Liquids	D001	5 X 55						Environmental Enterprises	OHD083377010	Fuel Blend
Waste Aerosols	D001	1 X 55						Environmental Enterprises	OHD083377010	Incinerate
Waste Corrosive Liquid, Toxic	D002, D003, P030	1 X 55						Environmental Enterprises	OHD083377010	Incinerate
	P098									
Waste Toxic Liquid, Organic	D006, D008	1 X 55						Environmental Enterprises	OHD083377010	Incinerate
Hazardous Waste Solid	D008	1 X 30						Environmental Enterprises	OHD083377010	Subtitle C landfill
Waste Toxic Liquid, Organic	None	4 X 55						Environmental Enterprises	OHD083377010	Subtitle D landfill
Waste Polychlorinated Biphenyls	PCB 2	1 X 5						Environmental Enterprises	OHD083377010	Recycle
Waste Toxic Liquid, Organic	None	4 X 55						Environmental Enterprises	OHD083377010	Subtitle D landfill
Waste Flammable Liquids	D001, D035, F002	2 X 55						Environmental Enterprises	OHD083377010	Fuel Blend
	F003, F005									
Waste Flammable Liquids	D001, D035, F003	1 X 30						Environmental Enterprises	OHD083377010	Fuel Blend
	F005									
Waste Toxic Liquid, Organic	None	1 X 55						Environmental Enterprises	OHD083377010	Incinerate
Waste Corrosive Solid	None	1 X 5						Environmental Enterprises	OHD083377010	Wastewater Treatment
Waste Oxidizing Liquid	D001, D007	1 X 10						Environmental Enterprises	OHD083377010	Wastewater Treatment
Waste Organic Peroxide, Type F, Solid	D001	1 X 5						Environmental Enterprises	OHD083377010	Incinerate
Waste Battery, Wet, Filled with Acid	D002, D008	1 X 5						Environmental Enterprises	OHD083377010	Recycle

[illegible]

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